

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Alexandria Division**

AMAZON.COM, INC. and AMAZON DATA
SERVICES, INC.,

Plaintiffs,

v.

WDC HOLDINGS LLC dba NORTHSTAR
COMMERCIAL PARTNERS, et al.,

Defendants.

CASE NO. 1:20-CV-484-RDA-IDD

800 HOYT LLC,

Intervening Interpleader Plaintiff /
Intervening Interpleader Counter-
Defendant,

v.

BRIAN WATSON, WDC HOLDINGS, LLC, and BW
HOLDINGS, LLC,

Interpleader Defendants,

and

AMAZON.COM, INC., and AMAZON DATA
SERVICES, INC.,

Interpleader Defendants / Interpleader
Counter-Plaintiffs.

DECLARATION OF GEORGE R. CALHOUN

1. I am a member of the law firm Ifrah Law PLLC and attorney of record for Defendants Brian Watson; WDC Holdings LLC, dba Northstar Commercial Partners (“Northstar”); Sterling NCP FF, LLC; Manassas NCP FF, LLC; and NSIPI Administrative Manager (collectively, the “Watson Defendants”) in the above-captioned matter. I have personal knowledge of the matters contained in this Declaration. If called, I could and would testify competently to the matters set forth herein.

2. I submit this declaration in support of the Reply in Support of the Watson Defendants' Motion for Summary Judgment.

3. Attached hereto as Exhibit 1 is a true and correct copy of the excerpted transcript of the deposition of Chris Vonderhaar, as Rule 30(b)(6) representative of Plaintiffs Amazon.com, Inc. and Amazon Data Services, Inc., conducted on September 14, 2022.

4. Attached hereto as Exhibit 2 is a true and correct copy of a document titled "Estoppel Certificate," Bates-stamped AMZ-CVL-065762 to AMZ-CVL-065764.

5. Attached hereto as Exhibit 3 is a true and correct copy of the excerpted transcript of Charles Kuhn, conducted on March 3, 2022.

I declare under penalty of perjury that the foregoing is true and correct.

Respectfully submitted,

Dated: February 8, 2023

/s/ George R. Calhoun
George R. Calhoun (*pro hac vice*)

Counsel for the Watson Defendants